

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE  
FOR PERSONAL INJURY AND DEATH CLAIMS**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Ronald L. Motley (1944-2013)  
Jodi Westbrook Flowers / Donald A. Migliori, *Co-Chairs*  
MOTLEY RICE LLC

Robert T. Haeefe, *Co-Liaison Counsel*  
MOTLEY RICE LLC

**VIA ECF**

March 14, 2023

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committee for Personal Injury and Death Claims ("PEC") writes in relation to the Court's recent Order (ECF No. 8920), to the extent that it addressed certain plaintiffs' March 7, 2023 request (ECF No. 8908) for an extension of time to file objections to the March 3, 2023 Report and Recommendation issued by Magistrate Judge Netburn recommending imposition of damages against the Islamic Republic of Iran on behalf of a subset of "latent-injury" plaintiffs in this MDL (ECF No. 8901). Although the Court found the request for extension moot in light of the Court's decision to recommit the matter to the magistrate judge, the PEC notes that other parties in the MDL may have objections to certain aspects of the Report and Recommendation and requests that the Court extend the deadline for any such objections to the deadline for objections to Magistrate Judge Netburn's new Report and Recommendation following her consideration after the matter has been recommitted to her. The PEC believes judicial efficiency is promoted by such objections being filed concurrent with any objections to the magistrate judge's new Report and Recommendation. The PEC has conferred with the Plaintiffs' Executive Committee for Commercial Claims, and that Committee has no objection to this letter being filed.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Jodi Westbrook Flowers  
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*For the Plaintiffs' Exec. Committee for Personal Injury and Death Claims*

cc: The Honorable Sarah Netburn, U.S.M.J., via ECF  
All Counsel of Record via ECF